A VRS provider saying that emergency call processing is running fine for them ignores the larger issue: operations across the industry are disjointed. Even if providers establish teams whose sole purpose is to relay emergency calls, industry-level collaboration could conceivably be inhibited by an individual's sense of duty to the hand that feeds them—an idea that shouldn't be a part of the process. In fact, that same statement made by multiple providers—that all is as it should be—points to an even larger problem: either an unwillingness to cooperate for the greater good or a willful ignorance of the benefits.

For example: What is "it"[1] that is working so well, anyway? Being able to nail things down would be of significant benefit to both the interpreting and TRS user communities. Granted, interpretation is a subjective process, but, from beginning to end, how does the experience play out for the interpreter, caller, and PSAP operator? How should it?

Specifically:

What call management skills do interpreters need to exercise when relaying an emergency call? When does the PSAP operator have the right to interrupt communication from the client, and when does the caller take precedent? What sorts of "soft skills" are necessary? How should an interpreter comport him or herself: With urgency? With calm?

---

[1] Comments of CSDVRS, LLC, CG Docket 10-51, at pg. 46 (8/19/2013)

How does an interpreter in the "off" position [not actively interpreting] properly support the active interpreter? What sort of information are they looking for?

What sort of terminology should an interpreter know in order to relay an emergency call? What sort of medical instructions could a PSAP operator give [i.e. CPR]?

How does a provider actively support their interpreters' ability to maintain separation between the work they do and their personal feelings about it?

Is the experience of relaying a call enough for analysis and improvement upon methods? What should that process look like?

A regular symposium might be an excellent opportunity for professionals to come together and compare notes, but that sort of roundup could only happen on a quarterly basis, at best. It should go without saying that developments in this part of the industry should be shared to the benefit of all involved parties; whether listserv, wiki, or conference call, few modes of collaboration are as beneficial as the immediate feedback that comes with sharing a practice space with other interpreters who are also focused on the same task.

As for cost concerns, Sorenson Communications is correct—MCLS would not be an inexpensive venture[2]. Simply considering the lack of active industry-wide quality control measures [i.e.: regular test calls as opposed to an open complaint process], it's clear that something needs to be done; whatever happens from this point, more money will be spent on the effort than has been in years past. In that case, the questions are over the size of an effort sufficient to ensure the best possible experience and who should be responsible for funding it. As to whether MCLS, providers assuming responsibility on a rotating basis with dedicated resources, or an oversight body with authority over standards and quality control, I leave that answer in your most capable hands.

As an aside, a word on **non-compete agreements**. This affects emergency communications delivery tangentially in that some of the best talent in the industry has likely worked for a provider at one time or another. If an interpreter were rendered ineligible for participation in a centralized solution outside of the provider sphere as a result of their having signed a non-compete agreement, the pool of available talent would be significantly limited.

The real question here is whether or not improvement in an interpreter's skills should be considered the limited intellectual property of the provider. The claim that a provider, in training an interpreter to use its platform or process VRS calls, is

---

[2] *See* Comments of Sorenson Communications Inc., CG Docket 10-51, at pg. 43 (8/20/2013)

making an investment to develop in that interpreter a genuinely unique set of skills is empty.

After having relayed calls over three years under nine different brands and without disclosing proprietary information, I can tell you that platforms function more or less the same way across the industry. Additionally, interpreters develop their skills while working for a provider in one or more of three ways:

1. Repeated exposure to and experience interpreting standard forms of American Sign Language and its variants in a VRS environment;
2. Structured, employer-led professional development activity; and
3. Observation of and interaction with other interpreters of a wide variety of skill sets and experience.

Yes, the providers facilitate the opportunity for interactive skill development that only exists in this segment of the industry by providing a stream of calls from consumers, arranging for workshops and training, and, coincidentally, by maintaining a call center environment.

The catch, however, is that each of these opportunities for improvement is just that—an opportunity. In order to improve, the interpreter must put in the work: objective critical analysis; attendance at and participation in workshops and assimilation of learned material into daily use; and initiating and maintaining a

dialogue with co-workers. Bottom line, any improvements made are the fruit of the interpreter's labor, despite the company's generous contribution. Crude as the analogy may seem, providers didn't enhance interpreters' abilities by implanting them with proprietary bionics.

Put another way: A software engineer with limited experience using a certain programming language goes to work for a company on a piece of proprietary software. Over the months and years with the company, that engineer's understanding of the language becomes more sophisticated and, as a result, he or she is able to write more complicated code. If that engineer were to leave the company, any specific code written for its use would be considered its property, but the enhanced skills would not.